

David M. Stuart dstuart@cravath.com T+1-212-474-1519 New York

February 24, 2023

Smith et al. v. Annucci et al., 21-CV-01715 (RA) (OTW) [rel: 17-CV-07954 (RA) (OTW)]

Dear Judge Wang:

We submit this monthly joint status letter in accordance with the Court's November 1, 2022 Order. (ECF No. 172).

At this time, there are no document discovery disputes between the parties. Since the parties' last joint status letter, Defendants have made four additional document productions. They have now completed production of all Electronically Stored Information.

Since the parties' last joint status letter, Plaintiffs have taken one additional deposition. The parties have agreed to dates for Plaintiffs to take an additional five depositions. Plaintiff Smith's deposition began on February 3, 2023 and was completed on February 24, 2023.

Respectfully,

/s/ David M. Stuart

David M. Stuart Attorney for Plaintiffs

/s/ Andrew Blancato

Assistant Attorney General Andrew Blancato Attorney for Defendants The Honorable Ona T. Wang
United States District Court for the Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Room 20D
New York, NY 10007

VIA CM/ECF